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*Attorneys for Plaintiff Sustainable
Modular Management, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, for the use
and benefit of SUSTAINABLE MODULAR
MANAGEMENT, INC., a Texas corporation,
Plaintiff,

vs.

JE DUNN CONSTRUCTION COMPANY;
FEDERAL INSURANCE COMPANY;
HARTFORD FIRE INSURANCE COMPANY;
TRAVELERS CASUALTY AND SURETY
COMPANY OF AMERICA; DOE Individuals I-
X and DOE Entities I-X, inclusive,
Defendants.

JE DUNN CONSTRUCTION COMPANY
Counter-Plaintiff

vs.

SUSTAINABLE MODULAR MANAGEMENT,
INC., a Texas corporation,
Counter-Defendant.

Case No. 2:20-cv-00790- GMN-NJK

**AGREED MOTION TO DISMISS
WITH PREJUDICE**

Plaintiff, Sustainable Modular Management, Inc. ("Plaintiff"), and Defendants, JE Dunn Construction Company, Federal Insurance Company, Hartford Fire Insurance Company, Travelers Casualty and Surety Company of America, DOE Individuals I-X and Does Entities I-X, (the "Defendants") (collectively referred to as the "Parties"), submit their Agreed Motion to Dismiss with Prejudice (the "Motion"), and respectfully show the Court as follows:

Plaintiff and Defendants have settled all of their respective claims arising out of and/or relating to the above-captioned case, the allegations and causes of action stated in the pleadings, and the circumstances that gave rise to this action.

The Parties therefore respectfully request this Court grant this Motion and dismiss all claims and causes of action that Plaintiff and Defendants brought or could have brought against each other in this lawsuit, with prejudice to the refiling of same.

DATED July 11, 2025.

HARTWELL THALACKER, LTD

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Michael S. Alfred

By: /s/ Robert Roos

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*Attorneys for Defendant/Counterclaimant
 JE Dunn Construction Company and Surety Defendants*

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that on July 11, 2025, that the above MOTION TO RESET IN-PERSON PRE-TRIAL CONFERENCE was served via electronic service on all counsel of record.

/s/ Michael S. Alfred

Michael S. Alfred

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Modular Management, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, for the use
and benefit of SUSTAINABLE MODULAR
MANAGEMENT, INC., a Texas corporation,
Plaintiff,

vs.

JE DUNN CONSTRUCTION COMPANY;
FEDERAL INSURANCE COMPANY;
HARTFORD FIRE INSURANCE COMPANY;
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COMPANY OF AMERICA; DOE Individuals I-
X and DOE Entities I-X, inclusive,
Defendants.

JE DUNN CONSTRUCTION COMPANY
Counter-Plaintiff

vs.

SUSTAINABLE MODULAR MANAGEMENT,
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Counter-Defendant.

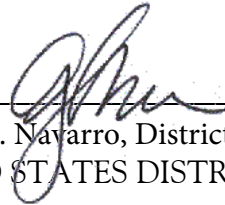
Case No. 2:20-cv-00790- GMN-NJK

**ORDER GRANTING AGREED MOTION
TO DISMISS WITH PREJUDICE**

After having considered the Agreed Motion to Dismiss with Prejudice [Dkt.178] (the “Motion”) filed by Plaintiff, Sustainable Modular Management, Inc. (“Plaintiff”), and Defendants, JE Dunn Construction Company, Federal Insurance Company, Hartford Fire Insurance Company, Travelers Casualty and Surety Company of America, DOE Individuals I-X and Does Entities I-X, (the “Defendants”), the Court finds that the Motion should be granted.

Therefore, the Court ORDERS that this lawsuit and all claims asserted or that could have been asserted by and between Plaintiffs and Defendants be, and are hereby, dismissed with prejudice to the re-filing of same, with each party bearing its own costs and attorney’s fees.

Dated: July 14, 2025.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

AGREED:

HARTWELL THALACKER, LTD

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Michael S. Alfred

By: /s/ Robert Roos

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JE Dunn Construction Company and Surety Defendants*

Attorneys for Plaintiff